Chapter 3.5
Hazard correction tracking

1. Applicability of this chapter

You are required to follow this chapter if:

a. You work at JSC or a JSC field site as a civil servant or contractor.

b. You are a supervisor, facility manager, contractor safety representative, or director. Paragraph 7 of this chapter lists your responsibilities.

c. Paragraph 7 of this chapter also lists the responsibilities of the Safety and Test Operations Division, contracting officers, and contracting officers' technical representatives.

2. Description of Sub-element 3.5

JSC has a system for initiating and tracking hazard elimination or control in a timely manner. The system shall:

a. Track all hazards identified through inspections, investigations, employee reports, surveys, etc. to completion.

b. Include interim measures to protect employees and the environment from hazard while permanent action is in work.

3. Hazard correction and tracking

JSC tracks hazard correction to closure using abatement plans (also commonly referred to as action plans or corrective action plans) developed to address hazards found during hazard analyses, mishap investigations, close call investigations, inspections, surveys, and other similar activities where hazards are identified and analyzed.

a. Abatement plans consist of interim abatement and final abatement:

1. ***Interim abatement*** consists of temporary fixes to control the hazard until a permanent fix can be done. Interim abatement actions bring hazards under immediate control through temporary administrative controls, training, personal protective equipment, etc. You shall take interim action as rapidly as possible to ensure protection of workers and equipment. Interim abatement must remain effective until final abatement is complete. The level of risk after interim abatement may or may not be lower than the original risk but must be no worse than a RAC 3 (see chapter 3.2 for details).

2. **Final abatement** consists of permanent fixes to control a hazard. This generally results in a lower level of risk using engineering controls as opposed to administrative controls.

b. Hazard correction and tracking at JSC shall follow the hazard abatement process found online at http://www6.jsc.nasa.gov/safety/HATS/. This process involves teamwork when

developing abatement plans, assigning actions, getting help to complete action items, and verifying closure.

c. The Hazard Abatement Tracking System (HATS) is the principle system at JSC to track hazard correction to closure. All line organizations are expected to participate in this system. Contractors participate as specified in their contracts. The Safety and Test Operations Division maintains this system. You shall enter hazards into HATS that meet any of the following conditions:

1. The hazard has a risk assessment code (RAC) of 1 or 2. See Chapter 3.2 for a discussion of the RAC.

2. You cannot fully abate the hazard within 30 days.

3. Any actions arising from a mishap investigation (including investigation boards.)

4. Any actions arising from a close call investigation not expected to be completed within 30 days of the being discovered in the investigation.

5. You need Center funding to fully abate the hazard. This generally applies to construction-type correction actions such as Construction of Facilities projects and minor construction, renovation, or repair.

6. Any hazard the Safety and Test Operations Division designates for tracking in HATS.

b. Line organizations, facility managers, and contractors may either use the HATS or their own tracking systems for hazards that do not meet the criteria of 3.a above. They shall be able to track hazards to the following level of detail as a minimum:

1. A description of the hazard including location, when found, who is responsible for the hazard (hazard owner), and a RAC.

2. Interim and final abatement plans including actions required; actions taken; assignees by name, organization, and title; due dates; and closure dates.

c. Internal action tracking processes and systems used by line organizations and contractors shall incorporate the basic features of the JSC hazard abatement process.

d. You shall document internal correction tracking processes and provide it to the Safety and Test Operations Division for review and audit. You may do this by providing on-line, read-only access to Safety and Test Operations Division personnel or their designated representatives.

Caution:

You shall never accept the risk of violating JSC, NASA, state, or federal requirements. If you think you can't follow any such requirement, request a variance as described in Chapter 1.4, "Written Safety and Health Program," of this Handbook.

4. How to use your abatement plans

In addition to documenting your abatement actions, interim and final abatement plans can be effective communications tools. You have a responsibility to inform your employees of the hazards in the work place and how they are being corrected. JSC Form 1240, "JSC Notice of Safety or Health Hazard and Action Plan," was designed to meet the requirements of both OSHA and NASA. The JF 1240 is an automated report available from HATS. You shall post it to warn employees of a hazard and protective measures and you may also use it foster communications about hazards as follows:

a. As a line manager (NASA or contractor) over the area or operation with the hazard, you are responsible for posting JF 1240 in your work areas.

b. As a facility manager, you are responsible for posting the JF 1240 if the area to be abated is not under the immediate control of a line organization or contractor.

c. Post a JF 1240 posted at the point of the hazard. This ensures that anyone approaching the hazard will be warned and be able to protect himself or herself.

    1. If final abatement likely will not occur within 30 days of the day the hazard was identified, you shall complete both parts of the form and post it within 30 calendar days of identification of the hazard.

    2. If final abatement will likely occur within 30 days of the day the hazard was identified, you shall either post only part 1 of JF 1240 or provide another forum to inform employees of the hazard in a timely manner and what was done to fix it. The decision to post such a form depends on the criticality of the hazard, who may be exposed to it, and the type of controls used. If you decide not to post the form, coordinate with the facility manager, the Safety and Test Operations Division, or the Clinic Services Branch where health issues are involved.

d. You may use the JF 1240 in staff meetings, safety meetings, tool box sessions, or any other forum that is used to communicate with employees and other managers. When such forms are used in such meetings, it is highly recommended this be noted in minutes, agendas, etc.

NOTE: If you are unable to get a JF 1240 as a completed form from HATS, contact HATS by e-mail requesting a JF 1240 for each of the HATS items you desire. You can find HATS JSC's global e-mail address book under "HATS," or you can send an e-mail to jsc-safety-report-submittals@nasa.gov

5. If you need more time or money to correct a hazard

The online hazard abatement process at http://www6.jsc.nasa.gov/safety/HATS/ tells you how to keep your abatement schedule up to date. Any hazards in HATS will be tracked automatically and reminders sent to the hazard owner and facility manager if an abatement plan is past due. Similarly, if an action item is past due, action assignees shall be notified with a copy sent to the hazard owner and facility manager. If you need more money because you cannot correct the hazard within your budget:

a. Make sure this is reflected in your abatement planning in the form of interim controls etc. as described above. Involve your personnel in the development of such plans wherever appropriate.

b. Make sure your hazard and your abatement plan is documented in HATS.

c. Use available funding processes to obtain the funds needed. Use NASA Form 1584, "Safety and Health Hazard Abatement Plan," if you need to ask NASA Headquarters for funding.

   1. Send a copy to the JSC Safety and Test Operations Division.
   2. Send a copy to the Director, Safety and and Assurance Requirements Division, NASA-Headquarters, for safety issues.
   3. Send a copy to the Chief Health and Medical Officer, NASA-Headquarters, for health issues.

d. Make sure that progress to get funds is reported to HATS.

e. While awaiting funds, make sure your interim abatement controls remain effective.

6. Leased space off site

If you can't correct a hazard in a leased space yourself, notify the General Services Administration or the federal agency that leases the space of the hazard and ask for help to correct it in writing.

7. Responsibilities for tracking and correcting hazards

a. As a ***supervisor***, you are responsible for taking necessary actions to correct hazards in your work areas. This includes temporary measures to protect your employees and the environment while you wait on building or equipment changes. Improve on your corrective action periodically.

b. As a ***contractor safety representative***, you are responsible for helping contractor or NASA management with tracking and correcting hazards as necessary

c. As a ***facility manager***, your knowledge of your facility is important for correcting hazards. You are responsible for making sure that:

   1. Hazards found in your facility are reported and corrected.
   2. Employees in your facility know about corrective action plans.

d. As an organizational ***director*** at JSC, you are responsible for:

   1. Developing processes for tracking and correcting hazards in your directorate.
   2. Reviewing open hazard reports for your directorate and make sure they are closed in a timely manner.
   3. Providing services from your directorate that other JSC organizations need to correct hazards such as testing, evaluating data, modifying buildings or equipment, or sampling work areas.

e. The ***Safety and Test Operations Division*** is responsible for:

   1. Reviewing and approving hazard reports and corrective action plans.
   2. Coordinating with the Environmental Office on environmental issues.
   3. Coordinating with the Clinic Services Branch on health issues.
   4. Helping JSC contracting officers and technical representatives develop requirements for reporting and correcting hazards for their solicitations and contracts.

f. ***Contracting officers and technical representatives*** are responsible for making sure that JSC contractors understand and follow NASA and JSC contract requirements for tracking and correcting hazards.

8. Safety and health records

The following records document hazard correction tracking:

a. Center-level – the HATS database.

b. Organizational-level:

   - Tracking systems in individual line organizations that document hazards not entered into HATS and their correction.
   - Posted JSC Forms 1240, "JSC Notice of Safety or Health Hazard and Action Plan."
   - Work requests and other documentation related to correcting hazards.

9. Measurement

The following factors measure hazard correction tracking:

a. Timeliness in correcting hazards.

b. Timeliness in maintaining status of hazard correction.